

IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MOHAMMED AZHARUDDIN CHHIPA,

Defendant.

Case No. 1:23-cr-97

The Honorable David J. Novak

Trial: December 6, 2024

STIPULATIONS

The United States of America, by and through undersigned counsel, and the defendant Mohammed Azharuddin Chhipa, through his counsel, for purposes of trial stipulate as follows:

A. Stipulation Regarding Authenticity of Records

The parties stipulate to the authenticity of the records produced by the United States in discovery that are identified in the below table by custodial source and Bates number and further agree that they constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, or are otherwise authentic, without requiring further authentication, certification, or testimony.

Custodian	Bates Range & Government Exhibit No.
Facebook/Instagram/Meta	<p>FBI-002 – FBI-0097 (Carl Johnson FB [-2850] non-content); Government Exhibit No(s): 2-1</p> <p>FBI_5181-5182 (Carl Johnson FB [-2850] search warrant return); Government Exhibit No(s) 2-4, 2-5, 2-6, 2-7, 2-8, 2-9, 2-10, 2-54, 2-82</p> <p>FBI_5189-5190 (Nu'Man Ibn Muqrin Al Muzanee FB [4619] search warrant return); Government Exhibit No(s) 2-39, 2-40, 2-41, 2-42, 2-43, 2-78, 2-79</p> <p>FBI_5178 (Abdullaah Ibn Rawa'hah FB [-2119] search warrant return); Government Exhibit No(s) 2-44, 2-45,</p>

	<p>FBI_5210 (Abdullaah Ibn Rawa'hah FB [-2119] search warrant return); Government Exhibit No(s) 2-46, 2-67, 2-68</p> <p>FBI_5219 (Abdullaah Ibn Ateeq FB [-0435] search warrant return); Government Exhibit No(s) 2-47, 2-48, 2-49, 2-55, 2-57, 2-58; 2-59; 2-62; 2-63; 2-64; 2-65; 2-66, 2-90, 2-98, 2-99, 2-100, 2-102</p> <p>FBI_1652 – FBI_1653 (Numan.ibn.muqrin IG [-8803] non-content); Government Exhibit No(s) 2-50</p> <p>FBI_5213 (Numan.ibn.muqrin IG [-8803] search warrant return); Government Exhibit No(s) 2-52, 2-56, 2-69, 2-70, 2-71, 2-72, 2-73, 2-74, 2-76, 2-77, 2-81, 2-84, 2-85, 2-87, 2-88, 2-89, 2-101, 2-103; 2-104; 2-105</p> <p>FBI_7658 (Numan.ibn.muqrin IG [-8803] search warrant return); Government Exhibit No(s) 2-51, 2-58, 2-60, 2-91, 2-92, 2-106, 2-107, 2-165</p> <p>FBI_5215-5216 (Umm Zubayr Al Muhajirah IG [-0236] search warrant return); Government Exhibit No(s) 2-108, 2-109, 2-110, 2-111, 2-112, 2-139, 2-143, 2-144, 2-145, 2-146, 2-147, 2-148, 2-149, 2-161</p> <p>FBI_5342-5343 (Umm Dujanah al Muhajirah FB [-5030] search warrant return); Government Exhibit No(s) 2-113, 2-114, 2-115, 2-116, 2-117, 2-118</p> <p>FBI_5336-5337 (Umm Talha IG [-4207] search warrant return); Government Exhibit No(s) 2-128, 2-129, 2-130, 2-131, 2-140, 2-141, 2-142, 2-150, 2-151, 2-157</p> <p>FBI_5279-5280 (Saabiruwarabitu IG [-1458] search warrant return); Government Exhibit No(s) 2-119, 2-120, 2-121, 2-122, 2-123, 2-124, 2-125, 2-126, 2-127, 2-153, 2-154, 2-158, 2-159, 2-160</p> <p>Unclass 3085 – Unclass 3093 (Saabiruwarabitu IG [-1458] non-content); Government Exhibit No(s) 2-162</p> <p>GJ 8010-8011 (Umm3Imaarah IG [-2267] non-content); Government Exhibit No(s) 2-163</p>
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	FBI_5339-5340 (Umm3Imarah IG [-4739] search warrant return); Government Exhibit No(s) 2-132, 2-133, 2-134, 2-135, 2-136, 2-152, 2-155, 2-156
Google	GJ_656 – GJ_657; Government Exhibit No(s) 2-2
EBay	GJ_1650 – GJ_1653; Government Exhibit No(s) 2-3
PayPal	GJ 2545; Government Exhibit No(s) 2-11
Greyhound	Unclass 613-615; Government Exhibit No(s) 2-12 Unclass 668-671; Government Exhibit No(s) 2-13
DMV	FBI_3120; Government Exhibit No(s) 2-179
Federal Bureau of Prisons Records	FBI 4680; Government Exhibit No(s) 2-164
Apple Federal Credit Union	GJ_114-149, 159, 379-392, 401-448, 877-919, 932-959, 965-986, 996-1027, 1030-1032, 1035-1047, 1052-1094, 1110-1159, 1199-1214, 1224-1269, 6580, 6590-6592, 6596, 6601, 6604, 6606-6607, 6631-6639, 6906-6908, 6911, 7/1/20-9/30/20 AFCU Statements (Accounts 0000362450, 0000363505); Government Exhibit No 10-1
Binance.com	GJ_180-182, 192, 364, 367, 376-377, 835, 843, 876, 7163, 7179; Government Exhibit No 10-2
Binance.US	GJ_6881; Government Exhibit No 10-3
Coinbase	GJ_6949-6989; Government Exhibit No 10-4 GJ_6948; Government Exhibit No 10-4A
Gemini	GJ_5929-5938, 6781-6791; Government Exhibit No 10-5 GJ_5927-5928, 6779-6780; Government Exhibit No 10-5A
Paypal	GJ_238-241, 6398-6400; Government Exhibit No 10-6 GJ_242, 244, 4657, 4668, 6401, 6407; Government Exhibit No 10-6A
Paysafe (Skrill)	GJ_5335, 5340-5354, 5361, 6493-6500, 6502-6503, 6505-6506, 6508-6509, 6511-6512 Government Exhibit No 10-7 GJ_5365, 6499, 6501, 6504, 6507, 6510, 6513; Government Exhibit No 10-7A

B. Stipulation Regarding Electronic Evidence from Devices Seized by FBI

The parties for purposes of trial stipulate to the following facts, as well as the authenticity, foundation, and proper chain of custody for the exhibits set forth below:

On August 2, 2019, during the course of the execution of a search warrant at 4036 Pender Ridge Terrace in Fairfax, Virginia, FBI SA Dan Abrams asked the residents of the house who resided in the first floor bedroom in the rear of the house. The defendant answered that he did. SA Marosy observed an LG brand Cellular telephone, model H990DS bearing serial number 711KPBF375421 and telephone number 571-598-7294, in that bedroom. SA Abrams took the aforementioned cell phone to the defendant, who inputted a pin code to unlock the phone. This phone was then examined by the FBI using industry standard software. Data obtained from this cell phone is Government Exhibit(s) 2-18, 2-19, 2-20, 2-21, 2-22, 2-23, 2-24, 2-25, 2-26, 2-27, 2-28, 2-29, and 2-30.

Also on August 2, 2019, during the execution of the search warrant at 4036 Pender Ridge Terrace in Fairfax, Virginia, the FBI seized an ULTRA desktop computer containing two hard drives from the second floor living room on a table. The first hard drive in the computer is a Western Digital Hard Drive, Model: WD6400AAKS-22A7B2, serial number WCASYC532914, size 640 GB. The second hard drive in the computer is a Western Digital Hard Drive, Model: WD20EARS-60MVWB0, serial number WCAZA8364941, size 2 TB. These items were then examined by the FBI using industry standard software. Data obtained from this computer and its hard drives includes Government Exhibit(s) 2-31, 2-32, 2-33, 2-34, 2-35 2-36 2-37, and 2-38.

On August 16, 2019, FBI SA Patrick Higgins seized an RCA MP3 player (serial number FAA3NM373A7705 S6302) from the defendant's luggage at Dulles airport. This MP3 player was

then examined by the FBI using industry standard software. Data obtained from this MP3 player includes Government Exhibit(s) 2-15, 2-16, and 2-17.

On May 4, 2023, the FBI executed a search warrant at 5901 Kingsford Road, Apartment H, Springfield, VA, 22152. FBI agents located a Oneplus phone model KB2007, IMEI 9900170913116212, bearing phone number 224-877-4019, on the floor next to the coffee table in the living room and seized it. This phone was then examined by the FBI using industry standard software. Data obtained from this phone includes Government Exhibit(s) 2-180, 2-181, 2-182, 2-183, 2-184, 2-185, 2-186, 2-187, 2-188, 2-189, 2-190, 2-191, 2-192, 2-193, 2-194, 2-195, and 2-196.

On May 4, 2023, during the aforementioned search warrant at 5901 Kingsford Road, Apartment H, Springfield, VA, 22152, FBI agents located a SanDisk USB micro storage device (thumb drive), bearing serial number BN1708256528, located on a plastic folding table in in the living room and seized it. This thumb drive was then examined by the FBI using industry standard software. Data obtained from this USB drive includes Government Exhibit(s) 2-197, 2-198, 2-199, 2-200, 2-201, 2-202, 2-203, 2-204, 2-205, and 2-206.

C. Stipulation Regarding Transcripts

The parties for purposes of trial stipulate that the transcripts identified by the following exhibit numbers are true and accurate transcripts¹ of the portions of the exhibits that they purport to transcribe: 2-14D, 2-15C, 2-107B, 2-167A, 5-1A, 5-2A, 5-3A, 5-4A, 7-11C, 7-11D, 8-2A, 8-8A, 8-17A, 8-22A, and 8-30A.

¹ This stipulation only applies to transcription. It does not apply to the translation of any Arabic terms contained therein.

D. Stipulation Regarding Bank Surveillance Videos

The parties for purposes of trial stipulate to the following facts, as well as the authenticity, foundation, and proper chain of custody and hearsay exception for the exhibits set forth below:

On August 15, 2021, the Apple Federal Credit Union located at 4097 Monument Corner Drive, Fairfax, VA had a properly functioning video surveillance system. A copy of the surveillance video that captured a deposit into the defendant's bank account at approximately 11:40AM on August 15, 2021 was obtained by the FBI. The video has not been modified, and fairly and accurately depicts the events at that location at that time and place. A copy of that video, which was produced in discovery as GJ_566, is Government Exhibit 2-174.

On October 28, 2021, the Apple Federal Credit Union located at 4097 Monument Corner Drive, Fairfax, VA had a properly functioning video surveillance system. A copy of the surveillance video that captured a deposit into the defendant's bank account at approximately 5:10PM was obtained by the FBI. The video has not been modified, and fairly and accurately depicts the events at that location at that time and place. A copy of that video, which was produced in discovery as GJ_570, is Government Exhibit 2-175.

On November 18, 2021, the Apple Federal Credit Union located at 4097 Monument Corner Drive, Fairfax, VA had a properly functioning video surveillance system. A copy of the surveillance video that captured a deposit into the defendant's bank account at approximately 6:14PM on November 18, 2021 was obtained by the FBI. The video has not been modified, and fairly and accurately depicts the events at that location at that time and place. A copy of that video, which was produced in discovery as GJ_577, is Government Exhibit 2-176.

On January 15, 2022, the Apple Federal Credit Union located at 4097 Monument Corner

Drive, Fairfax, VA had a properly functioning video surveillance system. A copy of the surveillance video that captured a deposit into the defendant's Apple Federal Credit Union account at approximately 10:14AM was obtained by the FBI. The video has not been modified, and fairly and accurately depicts the events at that location at that time and place. A copy of that video, which was produced in discovery as GJ_605, is Government Exhibit 2-178.

E. Stipulation Regarding Tasneem Mac

The parties for purposes of trial stipulate to the following facts:

The user operating the Facebook profile, Tasneem Mac, at all relevant times in this case, was a paid confidential human source, operating under the control of a foreign government.

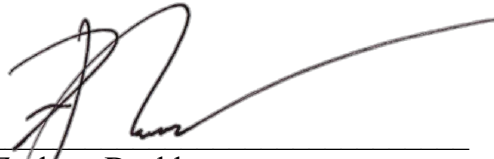
F. Stipulation Regarding Photographs of Money

The parties for purposes of trial stipulate to the following facts, as well as the authenticity, foundation, and proper chain of custody for the exhibits set forth below:

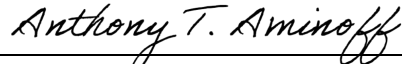
In advance of the August 15, 2021 meeting between undercover Special Agent ("S.A.") Alexandra Weaver and the defendant, S.A. Weaver's handling agent from the FBI provided her with \$300 U.S. currency. That agent took a photograph of the currency, and the photograph fairly and accurately depicts the U.S. currency that was given to S.A. Weaver. The photograph was provided in discovery as FBI_2686 and is reproduced as Government's Exhibit 8-6.

In advance of the November 18, 2021 meeting with S.A. Alexandra Weaver, S.A. Weaver's handling agent from the FBI provided her with \$260 U.S. currency. That agent took photographs of the currency, and the photographs fairly and accurately depict the U.S. currency that was given to S.A. Weaver. The photographs were provided in discovery as FBI_1748, FBI_1749, FBI_1750, FBI_1751, and FBI_1752 and they are reproduced as Government's Exhibit 8-23.

So stipulated.



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